

REMARKS

Claims 1-3, 7 and 9-13 are pending in the application. By the present amendment, claims 1-3, 7 and 9-12 have been amended for clarity, new claim 13 has been added, and claims 4-6 and 8 have been canceled without prejudice or disclaimer as to the subject matter contained therein. Favorable reconsideration of the application is respectfully requested.

The rejection of claims 1-12 under 35 U.S.C. §103(a) over Kamalanathan (U.S. Patent No. 6,052,722) in view of Applicant Admitted Prior Art (AAPA) and Comer ("Internetworking with TCP/IP), is respectfully traversed. Without acquiescing in the rejection, claims 1-3, 7 and 9-12 have been amended for clarity, and claims 4-6 and 8 have been canceled without prejudice or disclaimer. It is noted that Kamalanathan is incorrectly recited in the Office Action as U.S. Patent No. 5,978,373. As set forth above, Kamalanathan is U.S. Patent No. 6,052,727. U.S. Patent No. 5,978,373 is a patent to Hoff et al. which was cited in an earlier Office Action. Accordingly, the rejection will be discussed with respect to the combination of Kamalanathan, AAPA and Comer, and the claims, as amended.

Kamalanathan is concerned with the operation of an administrator server to respond to a request from a device that already has an IP address to send a broadcast packet to devices on the network. The reply packets from the client devices contain their IP addresses. There is no structure in Kamalanathan that would enable Kamalanathan to respond to an invalid IP address. Kamalanathan expressly acknowledges that if the client

does not have DMI 2.0 installed, the client will not send a reply packet and will not be "discovered." By analogy, if the client provides an invalid address it will also not be "discovered" by the server.

None of the art cited in the Office Action (i.e., AAPA, Kamalanathan and Comer) discloses or suggests the operation of a proxy that is separate from the unknown device and the server. Moreover, none of these references, either singly or in combination, discloses the operation of a discovery protocol by a proxy separate from the server. Additionally, none of the prior art relied upon in the Office Action discloses or suggests that the proxy will request an address from the server in response to the reception of an invalid IP address at the proxy.

The claimed invention, on the other hand, and in complete distinction, specifically recites that the proxy is separate from the server and that the proxy sends a request for an IP address to the separate server. As set forth above, none of these specifically recited features are disclosed or suggested in any of the art cited in the Office Action.

It is respectfully submitted that even if, *arguendo*, the combination of references were proper, none of Kamalanathan, Comer or the AAPA, either singly or in combination, disclose or suggest these specifically recited features. There is no teaching or suggestion anywhere in these references of the specifically recited features of a server being separate from the proxy and the proxy sending a request for an IP address to the server. Therefore, the combination of Kamalanathan, Comer and AAPA fails to render

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the claimed invention obvious. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

The rejection of claims 2-6, 8-10 and 12 under 35 U.S.C. §103(a) over Kamalanathan, AAPA and Comer in view of Ford et al. (U.S. Patent No. 6,101,499, hereinafter "Ford") is respectfully traversed. Without acquiescing in the rejection, it is noted that claims 4-6 and 8 have been canceled without prejudice, and claims 2, 3, 9, 10 and 12 have been amended for clarity. Accordingly, the rejection will be discussed with respect to the pending claims as amended.

It is respectfully submitted that Ford fails to overcome the fundamental deficiencies noted above with respect to Kamalanathan-AAPA-Comer. Therefore, even if, *arguendo*, the combination of Ford with Kamalanathan-AAPA-Comer were proper, the combination nevertheless fails to render the claimed invention obvious. For example, there is no teaching or suggestion in Ford of the use of a proxy in the manner claimed. The AAPA relates to the request from the client device, not a proxy. The discussion in Ford relates to the request for IP addresses from the devices themselves to a server. Thus, the proposed combination fails to render the claimed invention obvious. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

In view of the foregoing, it is respectfully submitted that the entire application is in condition for allowance. Favorable reconsideration of the application and prompt allowance of the claims are earnestly solicited.

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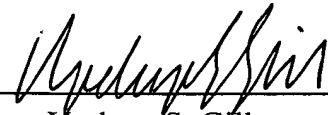
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Should the Examiner deem that further issues require resolution prior to allowance, the Examiner is invited to contact the undersigned attorney of record at the telephone number set forth below.

Respectfully submitted,

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